

## MEMO ENDORSED

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November 1, 2021

Hon. Kenneth Karas  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150

Re: *United States v Ruiz*, 18 Cr. 876 (KMK)

Your Honor:

I represent Wanda Ruiz in the referenced case and am submitting this letter to request that the sentencing, currently scheduled for November 10, 2021, be postponed until the week of December 6, 2021. The government consents to this application.

The reason for this request is that, despite repeated, strenuous efforts by Ms. Ruiz, we have had great difficulty obtaining her medical records (which are reportedly quite voluminous) from various medical providers. Over the past two weeks, these providers have repeatedly assured her that the records would be made available to counsel imminently. Indeed, one provider reportedly mailed out hard copies of records twelve days ago. Yet, none of those records have been received.

In view of the repeated delays in delivering such records – which are critical to Ms. Ruiz's sentencing submission – we ask that the sentencing be re-scheduled for sometime during the week of December 6<sup>th</sup>. Finally, I note that both parties are available on any day that week.

Respectfully submitted,

/s/  
James E. Neuman

*Granted. The  
sentence will go forward on  
December 8, 2021 at 2:00 PM*

SQ ORDERED

KENNETH M. KARAS U.S.D.J.

11/2/2021